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Attorneys for Defendant David Perez-Manchame

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

UNITED STATES OF AMERICA,)	No. 2:19-cr-103-GMN-MDC
)	
Plaintiff,)	Joint Stipulation To Amend One Aspect Of
)	The Complex Case Scheduling Order
v.)	
)	
JOSE LUIS REYNALDO)	
REYES-CASTILLO,)	
DAVID ARTURO PEREZ-MANCHAME,)	
and)	
ALEXANDER DE JESUS FIGUEROA-)	
TORRES)	
Defendants.)	

Plaintiff United States of America, and Defendants Jose Luis Reynaldo Reyes-Castillo, David Arturo Perez-Manchame, and Alexander De Jesus Figueroa-Torres, through their respective attorneys, hereby stipulate to amend the complex case scheduling order previously ordered in this case (ECF No. 158 and ECF No. 189) in one aspect:

The parties propose that **NO LATER THAN MONDAY, APRIL 7, 2025:**
the defendants will provide their expert witness disclosures in accordance with Federal Rule of Criminal Procedure 16(b)(1)(C),

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1 The parties agree that good cause exists for this amendment as discovery pertaining to ECF
2 No. 179 (Motion for Discovery of DNA Evidence Under FRCP 16(a)(1)(E)(i)) pertaining to items
3 2 through 5 identified in the motion remain undisclosed and are in the process of being produced to
4 defendants. Therefore, the parties agree that defense experts will need to review the same before any
5 notice and disclosure under FRCP 16(b)(1)(C) can made.

6 Date March 21, 2025

Respectfully submitted,

7 SUE FAHAMI
Acting United States Attorney
8 /s/ Melanee Smith
Melanee Smith
9 Steven Rose
Assistant U.S. Attorney

10 DAVID L. JAFFE
11 Chief, Organized Crime & Gang Section
U.S. Department of Justice
12 Justin Bish
Christopher Taylor
13 Trial Attorneys

14 /s/ John Balazs
RICHARD A. WRIGHT
15 MONTI J. LEVY
JOHN BALAZS
16 Counsel for defendant
JOSE LUIS REYNALDO REYES-CASTILLO

17 /s/ Michael Kennedy
18 ANDREA L. LUEM
MICHAEL J. KENNEDY
19 Counsel for defendant
DAVID ARTURO PEREZ-MANCHAME

20 /s/ Lisa A. Rasmussen
21 LISA A. RASMUSSEN
22 IVETTE A. MANINGO
Counsel for defendant
23 ALEXANDER DE JESUS FIGUEROA-TORRES

24 **IT IS SO ORDERED:**

25
26 MAXIMILIANO D. COUVILLIER, III
United States Magistrate Judge

3-26-25

Date

CERTIFICATE OF SERVICE

The undersigned certifies that he is a person of such age and discretion as to be competent to serve papers and that he served a copy of the foregoing through the Electronic Filing System to all parties.

/s/ Michael Kennedy
Law Offices of Michael Jerome Kennedy, PLLC